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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION

JESSE ANNE MAJORS,

Plaintiff,

v.

THOMAS JEFFERSON SCHOOL OF LAW, et al,

Defendants.

RESPONSE TO DOCKET ITEMS NUMBERED 59 AND 60

Case No.: 2:11cv00558 CW

Defendant responds to Plaintiff's filings docketed as numbers 59 and 60 by incorporating by reference its response to Plaintiff's items docketed as numbers 19, 29, 30, 31, 51, and 56 which they appear to replicate in whole or in part.

In short, Plaintiff has shown herself incapable of adhering to the rules of civil procedure, has failed to follow the requirements of Rule 4 Fed. R. Civ. P. and has shown no reason why the provisions of that rule ought not to apply to her.

DATED this 11th day of October, 2011.

/s/ Robert H Wilde ROBERT H. WILDE Attorney for Defendant Thomas Jefferson School of Law

Delivery Certificate

I hereby certify that I caused a true and correct copy of the foregoing Memorandum to be served by the method(s) indicated below and addressed to the following on this 11th day of October, 2011.

Shane J. Shumway, Esq JONES, WALDO, HOLBROOK & MCDONOUGH 170 South Main Street, Suite 1500 Salt Lake City, Ut 84101 Via Telefax 801-328-0537 sshumway@joneswaldo.com

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/s/ Robert H Wilde